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## **EXHIBIT E**

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November 16, 2020

**By Electronic Mail**

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**Re: HMD Global Oy v. Acacia Research Corporation, No. 20-mc-\_\_\_ (C.D. California)**

Dear Messrs. Bragalone, Rastegar, Tice, and Palmer:

HMD Global Oy serves its portion of our joint stipulation under Local Rule 37-2, as well as the declarations and exhibits HMD Global will file with the joint stipulation. Because some of these documents contain information designed confidential, we have encrypted this production using VeraCrypt, free encryption software that you can download from <https://www.veracrypt.fr/>. Please access these documents as follows:

[REDACTED]

[REDACTED]

Unless we hear otherwise from you, we will take the FTP site down in a week.

As you know, you must return to your portion of the stipulation, together with all declarations and exhibits you will offer in support of your position, one week from today, November 23, 2020. Loc. R. 37-2. Please don't forget to include your signature block for the joint stipulation. We will combine your portion of the stipulation with ours and return it for your signature; you must return the signed document to us by the end of the next business day after you receive it. *Id.*

We also provide notice under Local Rule 79-5.2.2(b) that we will file with our joint stipulation documents marked as "Highly Confidential—Attorneys' Eyes Only" and "Highly Confidential—Outside Attorneys' Eyes Only" under the protective order in *Cellular Communications Equipment LLC v. HMD Global Oy*

Jeffrey R. Bragalone, Jonathan H. Rastegar, Jerry D. Tice, and Hunter S. Palmer

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(“*CCE v. HMD Global*”). We will file, with the same redactions as in *CCE v. HMD Global*, briefing on the motion to dismiss in that action (docket nos. 36, 47, 49, and 58). [REDACTED]

[REDACTED] we will do so again here unless you tell us otherwise.

Other than these materials, if there is anything that will appear in our stipulation or accompanying materials (including of course the stipulation itself) over which you claim confidentiality and request redaction, please provide your requested redactions as soon as possible, but no later than your responsive portions of the joint stipulation under Loc. R. 37-2. We will file those redacted versions and the Application For Leave to File Under Seal under Local Rule 79-5.2.2. Since none of the sealed information is confidential to HMD Global, you must file the appropriate declaration in support of sealing under Local Rule 79-5.2.2(b)(i).

Finally, as we discussed in separate letters, we will take your proposal of earlier today to our client this evening, and expect to get back to you tomorrow after we have been able to communicate with them. If that proposal results in an agreement, that agreement will presumably include withdrawal of this joint stipulation. We did not want those discussions to delay our motion any further, however, and will therefore proceed with them during the week provided by the Local Rules.

Thank you for your continued time and courtesy in this matter.

Very Truly Yours,

A handwritten signature in dark ink, appearing to read 'JK' or similar initials, followed by a horizontal line.

Jennifer A. Kash